

LEWIS FOR CONGRESS COMMITTEE, BOB ROSS, C.P.A. TREASURER
RICHARD LEWIS (CANDIDATE)
LOUISVILLE, KENTUCKY 40205

DECEMBER 10, 1994

RE: RESPONSE TO MUR 4012 BY CANDIDATE RICHARD LEWIS

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MR. MARK T.KIM

MR. KIM AS PER OUR CONVERSATION I WOULD LIKE TO FILE THIS
RESPONSE WITH A REQUEST FOR ADDITIONAL TIME TO MORE FULLY
RESPOND WHILE RETAINING THE RIGHT TO ACQUIRE COUNSEL.

DURING THE COURSE OF MY CAMPAIGN I RECEIVED PHONE CALLS
FROM THREE REPUBLICAN EXECUTIVE MEMBERS ASKING ME TO DROP
OUT OF THE RACE. ONE CALLER A FORMER CHAIRMAN OF THE
JEFFERSON COUNTY REPUBLICAN PARTY THREATENED REPRISALS IF
I DID NOT IN FACT DROP OUT OF THE RACE.

THE THIRD CALLER WAS A FORMER CHAIRMAN OF THE JEFFERSON
COUNTY REPUBLICAN PARTY WHO SUGGESTED I DROP OUT AND SAID
THERE WOULD BE REPRISALS IF I DID NOT. HE DID NOT SPECIFY
WHAT THOSE REPRISALS MIGHT BE. COULD MUR 4012 BE HIS IDEA
OF A REPRISAL ?

I WOULD LIKE TO LODGE A COMPLAINT AGAINST THOSE ABOVE WHERE
OR IF APPROPRIATE UNDER FEDERAL ELECTION LAWS FOR ATTEMPTING
TO INTERFERE WITH A FEDERAL CANDIDACY. THE THREAT OF AN FEC
COMPLAINT BY ONE AND OF UNSPECIFIED REPRISALS BY THE OTHER
CLEARLY LEAVE SOME QUESTION AS TO POSSIBLE MOTIVATIONS FOR MY
BEING INCLUDED IN THIS AMENDED COMPLAINT.

I WOULD LIKE TO STATE THE FOLLOWING FACTS IN THIS RESPONSE
FOR THE PURPOSE OF CLARIFYING WHY THE COMPLAINT AGAINST
RICHARD LEWIS OR THE LEWIS FOR CONGRESS COMMITTEE IS NOT
JUSTIFIED.

THE FOLLOWING STATEMENTS ARE FACTS. I (RICHARD LEWIS) AM NOT
NOW AND HAVE NOT BEEN A MEMBER OR OFFICER IN ANY OF THE
ORGANIZATIONS NAMED IN THIS COMPLAINT (EXCEPT FOR MY
COMMITTEE THE LEWIS FOR CONGRESS COMMITTEE) ! I HAVE NEVER
JOINED OR DONATED MONEY TO ANY OF THESE ORGANIZATIONS ! I
HAVE NO CONTROL OVER WHAT ANY OF THESE ORGANIZATIONS
DO, SAY, PRINT OR CIRCULATE ! I HAVE NOT PARTICIPATED IN ANY
CONSPIRACY TO GAIN CONTROL OVER OR DETERMINE WHAT ANY OF
THESE ORGANIZATIONS DO, SAY, PRINT OR CIRCULATE.

I HAVE NOT ENCOURAGED AUTHORIZED OR DIRECTED ANY ONE ACTING
AS AN AGENT IN MY CAMPAIGN OR ANY VOLUNTEERS TO MY CAMPAIGN
IN A CONSPIRACY TO FUND OR IN ANY WAY SHAPE OR DETERMINE WHAT
ANY OF THE ORGANIZATIONS NAMED AS RESPONDENTS DO, SAY, PRINT OR
CIRCULATE. I AT NO TIME AUTHORIZED PERSONALLY OR ASKED ANY
VOLUNTEER TO ASK FOR VOLUNTEERS TO PROCURE OR HELP HAND OUT
ANY MATERIAL FOR ANY ORGANIZATION OTHER THAN MY OWN COMMITTEE
(THE LEWIS FOR CONGRESS COMMITTEE).

INDIVIDUALS WHO OFFERED TO SERVE AS VOLUNTEERS IN THE LEWIS
FOR CONGRESS CAMPAIGN WERE ASKED IF THEY WOULD BE WILLING TO
CIRCULATE OUR FLYERS (PAID FOR BY MY COMMITTEE) IN A PRECINCT
OR PRECINCTS. THE ONLY FLYERS AUTHORIZED BY MY CAMPAIGN FOR
VOLUNTEERS TO DISTRIBUTE WERE THOSE WE WROTE AND WHICH THE
LEWIS FOR CONGRESS COMMITTEE PAID FOR ALL FLYERS PRODUCED BY
MY CAMPAIGN COMMITTEE INCLUDED THE LEGALLY REQUIRED
DISCLAIMER (PAID FOR BY THE LEWIS FOR CONGRESS COMMITTEE, BOB
ROSS C.P.A. TREASURER).

THOSE VOLUNTEERS WILLING TO CIRCULATE MY CAMPAIGN MATERIALS
WERE PROVIDED PRECINCT MAPS & THE APPROPRIATE AMOUNT OF MY
CAMPAIGN FLYERS. MY CAMPAIGN ALSO ASKED FOR VOLUNTEERS TO
HOLD FUND RAISERS, PARTICIPATE IN PHONE BANKS, HELP MAN THE

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VOICE AND HELP US PUT OUT 3,000 YARD SIGNS !

IF AT ANY TIME DURING MY CAMPAIGN ANYONE CLAIMING OR THINKING THEY WERE ACTING AS VOLUNTEERS IN MY CAMPAIGN HANDED OUT ANY MATERIAL NOT PUBLISHED AND PAID FOR BY MY CAMPAIGN (THE LEWIS FOR CONGRESS COMMITTEE) THEY DID IT WITHOUT MY KNOWLEDGE OR APPROVAL AND COULD NOT HAVE RECEIVED IT FROM MY HEADQUARTERS.

IT HAS BEEN MY OBSERVATION THAT THE ORGANIZATIONS NAMED AS RESPONDENTS OTHER THAN MY COMMITTEE THE (LEWIS FOR CONGRESS COMMITTEE) TYPICALLY CIRCULATE OR MAIL FLYERS DURING CAMPAIGNS. MY HOUSEHOLD RECEIVES GRASS ROOT ORGANIZATION FLYERS BY MAIL OR CURLED IN MY DOOR DURING VIRTUALLY EVERY ELECTION. AS A CANDIDATE YOU RECEIVE LARGE NUMBERS OF QUESTIONNAIRES FROM THESE TYPES OF ORGANIZATIONS AND REQUEST FOR PRESS PHOTOGRAPHS. DURING MY CAMPAIGN I RECEIVED OVER 10 OF THESE QUESTIONNAIRES. AS A CANDIDATE EVERY TIME YOU FILL ONE OUT YOU WONDER WHAT KIND OF INFORMATION THAT ORGANIZATION WILL PUT OUT ABOUT YOU. WILL THEY UNDERSTAND YOUR ANSWER, DID YOU UNDERSTAND THERE QUESTION ? WILL THE MEDIA TAKE ONE OF YOUR RESPONSES AND PAINT YOU INTO A CORNER ? WILL YOUR PLATFORM, MORAL BELIEFS OR RESPONSES TO QUESTIONNAIRES FROM ONE OR MORE OF THESE ORGANIZATIONS RESULT IN YOUR BEING LABELED AS A SINGLE ISSUE CANDIDATE BY THE MEDIA ? WILL MEDIA BIAS TOWARD ANY OF THESE ORGANIZATIONS RESULT IN NEGATIVE MEDIA EXPOSURE FOR YOUR CAMPAIGN.

b. ON W.H.A.S. RADIO, THE JANE NORRIS PROGRAM A CALL IN TALK SHOW. I WAS ACCUSED OF HAND DELIVERING A FLYER OR LETTER PRINTED BY DR. FRANK SIMON ORGANIZATION TO A WOMAN STATING HER NAME AS DEBBIE. I ADVISED THE CALLER (DEBBIE) THAT MY CAMPAIGN DID NOT AUTHORIZE ,WOULD NOT AUTHORIZE AND COULD NOT AUTHORIZE MAIL OR HAND DELIVER ANY MATERIAL NOT PRINTED FOR & PAID FOR OR RECEIVED AS A IN KIND DONATION TO MY CAMPAIGN & THAT ALL OF MY CAMPAIGN MATERIAL COULD CLEARLY BE IDENTIFIED BY THE DISCLAIMER STATING MY COMMITTEE NAME & TREASURES NAME AS REQUIRED BY F.E.C. REGULATIONS. I SUGGESTED TO DEBBIE THAT SHE SOBERLY REFLECT ON THE FACT THAT SHE WAS PUBLICLY ACCUSING ME OF BREAKING FEDERAL ELECTION LAWS. I PRESSED DEBBIE FOR MORE DETAILS, I ASKED HER FOR A DESCRIPTION OF THE ALLEGED FLYER. WHEN I ASKED HER WHERE AND WHEN I HAD HANDED HER THE ALLEGED FLYER SHE ADMITTED THAT HER CHILDREN HAD IN FACT REMOVED THE FLYER IN QUESTION (NOT MY CAMPAIGN MATERIAL) FROM THE MAILBOX & THAT SHE WAS OFFENDED BY ITS CONTENT WHICH SHE SAID HER CHILDREN HAD READ WHILE CARRYING IT FROM HER MAILBOX TO HER HOUSE. CLEARLY DEBBIE WAS CAUGHT IN A LIE SHE HAD ACCUSED ME OF PERSONALLY HAND DELIVERING TO HER A FLYER NOT PRINTED BY MY CAMPAIGN. SHE THEN ADMITTED ON THE SAME RADIO PROGRAM THAT THE FLYER IN QUESTION WAS IN FACT A FLYER PRINTED BY AND MAILED TO HER BY DR.SIMONS ORGANIZATION.

c. WITNESSES WERE PRESENT WHEN EXECUTIVE MEMBER OF THE STATE REPUBLICAN PARTY FAITH MERCKE CAME TO MY CAMPAIGN OFFICE OUTRAGED BY MAIL BEING SENT BY DR. FRANK SIMON. MAIL THAT I HAD NO KNOWLEDGE OF OR PARTICIPATION IN. FAITH MERCKE HAD LOST A (REPUBLICAN PRIMARY) RACE FOR STATE SENATE & STATED DR.SIMON WAS THE CAUSE OF HER LOSS. SHE SUGGESTED THAT I WAS EITHER BEING USED BY DR. FRANK SIMON OR TO STUPID TO RECOGNIZE I WAS BEING USED. FAITH SAID I WAS JUST GOING TO COST SUSAN STOKES (THE REPUBLICAN CANDIDATE THAT FAITH SUPPORTED) THE ELECTION & THAT I COULD NOT POSSIBLY WIN THE ELECTION. SHE SHOWED ME A FLYER WHICH SHE IDENTIFIED AS A COPY OF THE SAME FLYER DEBBIE HAD COMPLAINED ABOUT ON THE RADIO & TOLD ME THERE WOULD BE COMPLAINTS FILED WITH THE F.E.C. DURING THE COURSE OF OUR CONVERSATION FAITH ACKNOWLEDGED THAT DEBBIE FROM THE RADIO PROGRAM MENTIONED ABOVE HAD BEEN CAUGHT IN A LIE WHEN SHE ACCUSED ME OF HAND DELIVERING TO HER A FLYER PRINTED BY DR.SIMONS ORGANIZATION. SHE MADE IT ABUNDANTLY CLEAR THAT SHE DESPISED DR. SIMON. THIS CONVERSATION WAS WITNESSED BY MY BROTHER MICHAEL D.LEWIS. WHO RESIDES AT 7516 CEDAR CREEK ROAD FERN CREEK,KENTUCKY 40219

D. I HAVE INCLUDED MY CAMPAIGN MATERIALS FOR YOUR CONSIDERATION. PLEASE NOTE THESE FLYERS & ISSUE PAPERS TOOK A GREAT DEAL OF EFFORT & RESEARCH.PLEASE CONSIDER THAT WE HAD AN ALL VOLUNTEER STAFF. I BELEIVE OUR

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CAMPAIGN FLYERS COVERED THE ISSUES FACING KENTUCKY & THE NATION. I BELIEVED OUR FLYERS AND THE DETAILED FACTUAL INFORMATION WE PROVIDED WOULD RESULT IN A WINNING CAMPAIGN. THESE FLYERS AND ISSUE PAPERS DEVELOPED BY MY VOLUNTEER CAMPAIGN STAFF AND PAID FOR BY MY CAMPAIGN WERE THE ONLY MATERIALS AUTHORIZED BY MY CAMPAIGN FOR VOLUNTEERS TO HAND OUT. THOSE VOLUNTEERS WHO HELPED ME WITH RESEARCHING AND DEVELOPING CAMERA READY PROOF COPIES OF EACH FLYER & POSITION PAPER WILL TELL YOU HOW SERIOUSLY I TOOK MY CAMPAIGN MATERIAL. THEY WOULD TELL YOU THERE WERE A LOT OF RE WRITES AND DISAGREEMENTS ON WHAT TO SAY AND HOW TO SAY IT.

I BELIEVE THE FLYERS AND ISSUE PAPERS DEVELOPED BY MY CAMPAIGN ARE THE TYPE NEEDED TO WIN CAMPAIGNS. SINGLE ISSUE GROUPS & THEIR FLYERS & EVEN MULTIPLY MORAL ISSUE ONLY GROUPS AND THEIR FLYERS LIKE THOSE DESCRIBED AS EXHIBIT " E " IN THE COMPLAINT MUR 4012 IN MY OPINION OFTEN HELP DEFEAT CANDIDATES THAT SHARE THESE ORGANIZATIONS MORAL VALUES. THE SCOPE OF TABLOIDS LIKE THAT DESCRIBED AS EXHIBIT " E " ARE SO NARROW THEY LIMIT EVEN DIMINISH THE PUBLIC PERCEPTION OF (THE APPARENT RANGE AND SCOPE OF CANDIDATES). NEWSPAPERS & OTHER MEDIA THEN LABEL THOSE CANDIDATES WHO SHARE THE MORAL VALUES OF THESE ORGANIZATIONS AS ONLY SINGLE ISSUE OR NON VIABLE CANDIDATES WHICH COST THEM MORE VOTES !

IF YOU THINK ABOUT IT THE LEWIS FOR CONGRESS CAMPAIGN COMMITTEE HAD TO COMPETE WITH THE VERY ORGANIZATIONS NAMED AS RESPONDENTS FOR MONEY AND VOLUNTEERS. THE COMPLAINT STATES THAT I RICHARD LEWIS OR AGENTS ACTING ON MY BEHALF CONSPIRED TO PRINT AND CIRCULATE FLYERS WITH A ORGANIZATION OR ORGANIZATIONS NAMED IN THIS COMPLAINT.

RECOGNIZING THAT THERE ARE A VERY LIMITED NUMBER OF CITIZENS (STATISTICALLY ABOUT 3 %) THAT ARE POLITICALLY ACTIVE (WILLING TO DONATE TIME OR MONEY TO POLITICAL CAUSES) BY DEFINITION ANY TIME VOLUNTEERED OR MONEY DONATED TO THE ORGANIZATIONS NAMED AS RESPONDENTS (OTHER THAN THE LEWIS FOR CONGRESS COMMITTEE) LIMITED THE AMOUNT OF MONEY, FUNDING AVAILABLE TO THE LEWIS FOR CONGRESS COMMITTEE AND LIMITED THE NUMBER OF VOLUNTEERS & (VOLUNTEER TIME AVAILABLE TO CIRCULATE MY CAMPAIGN FLYERS.

IT SEEMS I AND MY CAMPAIGN COMMITTEE ARE BEING ACCUSED OF PREFERRING THE TABLOID OF A GRASS ROOTS POLITICAL COMMITTEE TO OUR OWN AUTHORIZED CAMPAIGN MATERIAL. SOME ONE IS CONVINCED I & MY COMMITTEE LIKED THIS TABLOID SO MUCH THAT I & MY COMMITTEE WERE WILLING TO VIOLATE CAMPAIGN ELECTION LAWS TO DISTRIBUTE THEM RATHER THAN DISTRIBUTING OUR OWN AUTHOURIZED MATERIALS.

I ASK THAT YOU COMPARE THE MATERIALS AUTHORIZED BY MY CAMPAIGN & INCLUDED IN THIS RESPONSE WITH THE TABLOID DESCRIBED AS EXHIBIT " E " AND WITH THE MATERIALS OF THE CANDIDATES THAT I OPPOSED IN THIS ELECTION.

I BELEIVE THE DIFFERENCE IN THE SCOPE OF ISSUES MY AUTHORIZED CAMPAIGN MATERIALS COVERED AS OPPOSED TO THE TABLOID EXHIBIT " E " SUPPORT THE FACT THAT I & MY CAMPAIGN HAD NO REASON OR DESIRE TO VIOLATE THE ELECTION LAWS THAT WE ARE ACCUSED OF VIOLATING IN MUR 4012 . PLEASE NOTE THAT I HAVE INCLUDED NOTARIZED RESPONSES FROM OMER L.CHESSER, DOUG LEWIS, ED PARKER & CLIFF WALLACE MORE OF THE VOLUNTEERS WHO PARTICIPATED IN MY RACE ARE WILLING TO PROVIDE DOCUMENTATION (NOTARIZED PERSONAL STATEMENTS) ABOUT THIS COMPLAINT & HAVE ALREADY INDICATED THAT THEY WISH TO PROVIDE ADDITIONAL INFORMATION FOR THIS REASON I ASK FOR THE ADDITIONAL TIME WE DISCUSSED.

DURING MY CAMPAIGN INDIVIDUALS THAT VOLUNTEERED TIME TO MY CAMPAIGN FOR THE PURPOSE OF HANDING OUT MY CAMPAIGN FLYERS HAD TO COME TO OUR CAMPAIGN HEADQUARTERS TO PICK THEM UP OR MAKE ARRANGEMENTS FOR SOMEONE TO DELIVER THEM FOR THAT VOLUNTEER .

AT NO TIME WAS BOB ROSS, MY CAMPAIGN TREASURER INVOLVED IN ANY DECISIONS MADE BY MY CAMPAIGN CONCERNING WHAT KIND OF PRINTED

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CAMPAIGN MATERIALS MY CAMPAIGN WOULD USE. IN FACT HE WAS NEVER ASKED & DID NOT ATTEND OR OFFER TO ATTEND ANY CAMPAIGN MEETINGS. HE WAS NEVER ASKED TO COME TO MY CAMPAIGN HEADQUARTERS OR TO HAND OUT ANY CAMPAIGN MATERIALS. I WAS THANKFUL FOR HIS PROFESSIONAL HELP IN FILING MY FINANCIAL REPORTS WHICH WAS HIS ONLY FUNCTION IN THE LEWIS FOR CONGRESS CAMPAIGN.

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IN RESPONSE TO MUR 4012 A COMPLAINT AMENDED TO INCLUDE
RICHARD LEWIS

RESPONSE TO #34 AS I DISCUSSED WITH MARK T. KIM OF THE
GENERAL COUNCILS OFFICE. I DID NOT RECEIVE THE COMPLETE
ORIGINAL COMPLAINT ONLY THOSE PORTIONS IN A DOCUMENT
DESCRIBED AS SUPPLEMENT TO ORIGINAL COMPLAINT. IF YOU RECALL
I ASKED FOR A COPY OF THE COMPLETE COMPLAINT IN ORDER TO
FULLY RESPOND & WAS ADVISED THAT THE COMPLETE COMPLAINT WOULD
OR COULD NOT BE PROVIDED TO ME. FOR THAT REASON I CAN NOT
APPROPRIATELY RESPOND TO THE FULL COMPLAINT. I AM ALSO
UNCERTAIN AS TO WHAT STAGE OR PHASE I AM BEING BROUGHT INTO
THIS COMPLAINT. UNDER THE DESCRIPTION OF PRELIMINARY
PROCEDURES FOR PROCESSING COMPLAINTS THAT YOUR OFFICE
(INCLUDED WITH THE AMENDED COMPLAINT) IT WOULD APPEAR THAT A
RECOMMENDATION SHOULD HAVE ALREADY BEEN MADE CONCERNING THE
ORIGINAL COMPLAINT BECAUSE MORE THAN 15 DAYS HAVE PASSED
SINCE THE RESPONSE ON THAT COMPLAINT WAS DUE ? HAS AN
AFFIRMATIVE VOTE OF THE COMMISSION ALREADY RESULTED IN AN
INVESTIGATION OR HAS IT PROGRESSED TO CONCILIATION EFFORTS OR
FURTHER ?

RESPONSE TO #35

I AM NOT A MEMBER, OFFICER OR VOLUNTEER IN FREEDOM'S HERITAGE
FORUM. I DID NOT PARTICIPATE AS AN INDIVIDUAL OR ASK, OR
AUTHORIZE ANY AGENT OF OR VOLUNTEER TO MY CAMPAIGN COMMITTEE
THE (LEWIS FOR CONGRESS COMMITTEE) TO PARTICIPATE IN WRITING,
PRINTING, PAYING FOR OR DISTRIBUTING A TABLOID ENTITLED
"CONGRESSIONAL CANDIDATE REPORT " LISTED IN THIS COMPLAINT AS
EXHIBIT "E." I AT NO TIME HAD ANY CONTROL OR SOUGHT ANY
CONTROL AS A INDIVIDUAL, OR AS A CANDIDATE OVER ANY
ORGANIZATION OTHER THAN THE LEWIS FOR CONGRESS COMMITTEE. I
AT NO TIME ASKED ANY ONE ACTING AS AN AGENT OR VOLUNTEER TO
MY CAMPAIGN TO SEEK CONTROL OR INFLUENCE OVER ANY
ORGANIZATIONS INCLUDED OR NOT INCLUDED IN THIS COMPLAINT.

RESPONSE TO #36

I HAVE AT NO TIME HAND DELIVERED OR OTHERWISE PERSONALLY
DISTRIBUTED THE TABLOID DESCRIBED IN PARAGRAPH 35 OF THIS
COMPLAINT TO THE GENERAL PUBLIC. I HAVE AT NO TIME AUTHORIZED
ANY AGENTS OF OR VOLUNTEERS TO MY COMMITTEE, THE LEWIS FOR
CONGRESS COMMITTEE TO DISTRIBUTE THE TABLOID DESCRIBED IN
PARAGRAPH 35 OF THIS COMPLAINT.

I HAVE PARTICIPATED IN KENTUCKY POLITICS FOR 18 YEARS. IN
THOSE YEARS I PARTICIPATED AS AN OFFICER IN TWO GRASS ROOTS
POLITICAL ACTION COMMITTEE'S. I ALSO RAN FOR CONGRESS IN
1992. DURING THE TIME I WAS AN OFFICER IN THOSE ORGANIZATIONS
NO COMPLAINTS WERE FILED AGAINST THOSE ORGANIZATIONS.

I MADE THE STATEMENT IN THE PARAGRAPH IMMEDIATELY ABOVE TO
CLARIFY FOR YOU THAT I UNDERSTAND THE SERIOUS NATURE OF
VIOLATING ELECTION LAWS. I HOPE IT SPEAKS TO MY CHARACTER
THAT DESPITE MY LONG INVOLVEMENT IN POLITICS THAT UNTIL THIS
COMPLAINT I HAVE NEVER BEEN ACCUSED OF VIOLATING ELECTION
LAWS. CONTRARY TO THE ALLEGATIONS MADE AGAINST ME IN THIS
COMPLAINT. I DID NOT SPEND MY TIME IN CONSPIRACY TO BREAK
ELECTION LAWS TO THE CONTRARY IT IS A FACT THAT I AND MY
COMMITTEE (THE LEWIS FOR CONGRESS COMMITTEE HAD TO COMPETE
FOR VOLUNTEERS & DONATIONS WITH ALL OTHER POLITICAL
COMMITTEES AND CAMPAIGNS COMMITTEES, INCLUDING THE
ORGANIZATIONS THIS COMPLAINT ALLEGES I CONSPIRED WITH. MY
CAMPAIGN EXPENDED OVER 1/3 OF ITS FINANCIAL ASSETS FOR
PRINTED MATERIALS. MY CAMPAIGN NEEDED ENOUGH VOLUNTEERS TO
DISTRIBUTE ALMOST \$10,000 OF PRINTED MATERIALS. MATERIALS
PAID FOR BY MY CAMPAIGN ! I EXPLAINED TO EVERY VOLUNTEER
THAT PARTICIPATED IN DEVELOPING PRINTED MATERIALS FOR MY
CAMPAIGN THAT ELECTION LAWS REQUIRED THAT ALL PRINTED
MATERIALS USED IN MY CAMPAIGN HAVE A DISCLAIMER ON EACH
DOCUMENT STATING PAID FOR BY LEWIS FOR CONGRESS COMMITTEE, BOB
ROSS, CPA, TREASURER. MY HEADQUARTERS WAS LOCATED AT 4140
SHELBYVILLE RD. SUITE 201 LOUISVILLE, KENTUCKY 40207.

IF AT ANY TIME DURING THIS ELECTION ANY ONE VOLUNTEERING OR
CLAIMING TO VOLUNTEER IN MY CAMPAIGN HANDED OUT THE TABLOID

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DESCRIBED IN PARAGRAPH 35 OR ANY OTHER MATERIAL TO THE PUBLIC THAT WAS NOT AUTHORIZED AND PAID FOR BY MY COMMITTEE THEY DID SO WITHOUT MY APPROVAL OR KNOWLEDGE AND THEY CERTAINLY COULD NOT HAVE RECEIVED IT AT MY HEADQUARTERS !

RESPONSE TO 37

I REITERATE THE STATEMENTS MADE IN MY RESPONSE TO PARAGRAPHS 34, 35, & 36. I DID NOT PERSONALLY CONSENT TO OR AUTHORIZE ANY AGENT OF OR VOLUNTEER TO MY COMMITTEE (THE LEWIS FOR CONGRESS COMMITTEE) TO CONSENT TO WORK WITH ANY OTHER POLITICAL COMMITTEES FOR ANY PURPOSE. I HAVE NOT PARTICIPATED IN AUTHORIZING EXPENDITURES PERSONALLY AND I HAVE NOT AUTHORIZED ANY ONE ACTING AS AN AGENT OR VOLUNTEER TO MY COMMITTEE (THE LEWIS FOR CONGRESS COMMITTEE) TO APPROVE ANY EXPENDITURES TO PRODUCE A TABLOID DESCRIBED AS EXHIBIT "E" IN PARAGRAPHS 35 AND 36 OF THIS COMPLAINT. I HAVE NOT AUTHORIZED ANY VIOLATIONS OF CAMPAIGN ELECTION LAWS NAMED OR UNAMED IN THIS COMPLAINT AND I HAVE NOT ASKED ANY ONE ACTING AS AN AGENT OR VOLUNTEER IN MY CAMPAIGN TO VIOLATE CAMPAIGN LAWS NAMED OR UNAMED IN THIS COMPLAINT.

RESPONSE TO 38

THE EXPENDITURES SET FORTH IN PARAGRAPHS 35, 36 & 37 OF THIS COMPLAINT DO CONSTITUTE " INDEPENDENT EXPENDITURES " AS DEFINED AT 11 C.F.R. 109.1. BECAUSE ANY EXPENDITURES MADE TO PRINT THE FLYER DESCRIBED AS EXHIBIT "E" IN THIS COMPLAINT AND ANY EFFORT TO DISTRIBUTE THEM WAS DONE WITHOUT MY PARTICIPATION, COOPERATION OR APPROVAL AND I HAVE AT NO TIME AS A CANDIDATE FINANCED, AUTHORIZED OR ENCOURAGED ANY AGENT OR VOLUNTEER OF THE LEWIS FOR CONGRESS COMMITTEE TO FINANCE OR PARTICIPATE WITH ANY OTHER POLITICAL COMMITTEE OR ORGANIZATION NAMED OR UNAMED IN THIS COMPLAINT FOR ANY PURPOSE AS EXPLAINED IN MY RESPONSE TO PARAGRAPHS 34, 35, 36, & 37 OF THIS COMPLAINT.

RESPONSE TO 39

THE EXPENDITURES SET FORTH IN PARAGRAPHS 35, 36, AND 37 OF THIS COMPLAINT DO NOT CONSTITUTE IN KIND CONTRIBUTIONS TO THE CANDIDATE RICHARD LEWIS, AS DEFINED AT 11 C.F.R. 109.1(c) AND 11 C.F.R. 100.7 (a) BECAUSE THE ORGANIZATIONS, INDIVIDUALS OR AGENTS RESPONSIBLE FOR WRITING, PRINTING, PAYING FOR OR CAUSING THE CIRCULATION OF THE FLYER DESCRIBED AS EXHIBIT " E " IN THIS COMPLAINT DID SO AUTONOMOUSLY. THE INDIVIDUALS OR ORGANIZATIONS THAT PRODUCED PAID FOR AND ARRANGED TO CIRCULATE THE TABLOID DESCRIBED IN THIS COMPLAINT AS EXHIBIT "E" DID SO AT THEIR OWN EXPENSE USING THEIR OWN AGENTS OR VOLUNTEERS AND WITHOUT THE APPROVAL OR SUPPORT OF ME OR THE LEWIS FOR CONGRESS COMMITTEE. THE LEWIS FOR CONGRESS COMMITTEE IS A STAND ALONE COMMITTEE WE DID NOT WORK IN COOPERATION WITH ANY GRASS ROOTS POLITICAL COMMITTEES OR ORGANIZATIONS. THIS IS CLARIFIED IN MY RESPONSE TO PARAGRAPHS 34, 35, 36, 37, & 38. I AM NOT A MEMBER OR OFFICER OF ANY ORGANIZATION NAMED IN THIS COMPLAINT OTHER THAN MY OWN COMMITTEE. I HAVE NOT DONATED ANY MONEY TO THE ORGANIZATIONS NAMED IN THIS COMPLAINT AND I HAVE NOT AUTHORIZED, ENCOURAGED OR ASKED ANY ONE ACTING AS AN AGENT OR VOLUNTEER IN MY CAMPAIGN TO DONATE TO ANY POLITICAL COMMITTEE OR ORGANIZATION OTHER THAN MY OWN COMMITTEE THE LEWIS FOR CONGRESS COMMITTEE. I HAVE NOT PARTICIPATED IN WRITING OR ASKED ANY ONE ACTING AS AN AGENT OR VOLUNTEER IN MY COMMITTEE (THE LEWIS FOR CONGRESS COMMITTEE) TO PARTICIPATE IN WRITING THE TABLOID DESCRIBED AS EXHIBIT " E ". I HAVE NOT PERSONALLY DISTRIBUTED THE TABLOID DESCRIBED IN THIS COMPLAINT AS EXHIBIT " E ". I HAVE NOT AT ANY TIME AUTHORIZED ANY ONE ACTING AS AGENT OR VOLUNTEER TO MY COMMITTEE (THE LEWIS FOR CONGRESS COMMITTEE) TO HAND OUT THE TABLOID DESCRIBED IN THIS COMPLAINT AS EXHIBIT " E ".

RESPONSE TO 40

I AND THE LEWIS FOR CONGRESS COMMITTEE HAVE NO REASON OR WAY TO KNOW WHAT THE EXPENDITURES DESCRIBED IN PARAGRAPHS 35, 36 & 37 WERE. ANY ORGANIZATIONS, INDIVIDUALS, AGENTS OR VOLUNTEERS

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RESPONSIBLE FOR PRINTING OR DISTRIBUTING THE FLYER DESCRIBED AS EXHIBIT " E " DID SO AUTONOMOUSLY. THIS IS CLARIFIED IN MY RESPONSE TO PARAGRAPHS 34, 35, 36, 37, 38, & 39.

AT NO TIME DURING MY CAMPAIGN WAS BOB ROSS MY CAMPAIGN TREASURER INVOLVED IN ANY DECISIONS MADE BY MY CAMPAIGN CONCERNING WHAT KIND OF PRINTED CAMPAIGN MATERIALS MY CAMPAIGN WOULD USE. IN FACT HE WAS NEVER ASKED & DID NOT ATTEND ANY CAMPAIGN MEETINGS. HE WAS NEVER ASKED TO COME TO CAMPAIGN HEADQUARTERS OR HAND OUT ANY CAMPAIGN MATERIALS. I WAS THANKFUL FOR HIS PROFESSIONAL HELP IN FILING MY CAMPAIGN FINANCIAL REPORTS WHICH WAS HIS ONLY FUNCTION IN MY CAMPAIGN.

PLEASE NOTE Flyers ARE Included

RICHARD LEWIS

Richard Lewis

SIGNATURE WITNESSED BY HELEN LEWIS MY WIFE ON DECEMBER 10, 1994

HELEN LEWIS

Helen Lewis

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